

**REMARKS**

In the Office Action, the Examiner rejected claims 1-3, 5-24, and 28-31 as being unpatentable over U.S. Patent Application Publication No. 2004/0046789 of Inanoria (hereinafter, "*Inanoria*") in view of U.S. Patent Application Publication No. 2003/0225829 of Pena et al. (hereinafter, "*Pena*") and the document entitled "Information Visualisation using Composable Layouts and Visual Sets," authored by Tim Pattison et al. (hereinafter, "*Pattison*").

By this response, Applicants have amended independent claims 1, 16, 28, 29, 30, and 31. Claims 4, 25, 26, and 27 have been previously canceled. Accordingly, claims 1-3, 5-24, and 28-31 remain pending.

Based on the foregoing amendments and following remarks, Applicants respectfully traverse the rejection under 35 U.S.C. § 103(a), and request timely allowance of claims 1-3, 5-24, and 28-31.

**I. Claim Rejection Under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 1-3, 5-24, and 28-31 under 35 U.S.C. § 103(a) as being unpatentable over *Inanoria* in view of *Pena* and *Pattison*. "To establish a *prima facie* case of obviousness, the prior art reference (or references when combined) must disclose or suggest all the claim limitations." See *M.P.E.P.* § 2142, 8th Ed., Rev. 5 (August 2006). Moreover, "in formulating a rejection under 35 U.S.C. § 103(a) based upon a combination of prior art elements, it remains necessary to identify the reason why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed." *USPTO Memorandum* from Margaret A. Focarino, Deputy Commissioner for Patent Operations, May 3, 2007, p. 2. "[T]he

analysis supporting a rejection ... should be made explicit" and it is "important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements in the manner claimed." *Id.* (citing *KSR Int'l Co. v. Teleflex, Inc.*, No. 04-1350 (U.S. Apr. 30, 2007)).

A *prima facie* case of obviousness has not been established because, among other things, none of the cited art, nor any obvious variant thereof, taken alone or in any reasonable combination, discloses or suggests each and every element of Applicants' claims. Specifically, neither *Inanoria*, nor *Pena*, nor *Pattison*, teach or suggest, *inter alia*, "enabling a user to lay out one or more views for a user interface including allowing the user to select one or more user interface elements from a set of user interface elements for each of the one or more views," as recited in amended independent claim 1, and similarly recited in amended independent claims 16, 28, 29, 30, and 31.

**A. *Inanoria***

*Inanoria* fails to teach or suggest "enabling a user to lay out one or more views for a user interface including allowing the user to select one or more user interface elements from a set of user interface elements for each of the one or more views," as recited in amended independent claim 1. Instead, *Inanoria* teaches "handling a rich set of GUI components without having to implement web applications development technologies." *Inanoria*, Abstract. *Inanoria* further details the ineffectiveness of these development environments in delivering rich GUIs for web applications. *Id.* at ¶ [0007]. Instead of using the development environments and enabling a user to lay out one or more views for user interface, *Inanoria* teaches using XUI technologies to create declarative-formatted (XML or XSL tag based) GUI components. *Id.* Examples of the

declarative-formatted (XSL tag based) GUI components are shown throughout the specification of *Inanoria*. See e.g. ¶¶ [0104] and [0110].

In *Inanoria*, at runtime, “[u]pon receiving [an] HTTP request from [a] client user, [a] JSP file is invoked and a custom tag written in the file invokes the Controller.” *Id.* at ¶ [0128]. According to *Inanoria*, “[t]he Controller imports the template for and delegates control to the Layout Manager to parse and transform the markup information contained in the JSP file.” *Id.* “The Layout Manager then delegates control to the appropriate sub-template for the execution of the selected layout algorithm, which can then import the encapsulated CSS or JavaScript components. The Layout Manager uses one of the strongest attributes of an Object Oriented programming language wherein polymorphism is applied.” *Id.* Thus, prior to runtime, the GUI components in *Inanoria* exist only as XSL tags, and the XSL tags must be processed by the Layout Manager at runtime upon receiving an HTTP request for generating views. Figure 8 of *Inanoria* depicts only these runtime views.

Moreover, not only does *Inanoria* fail to disclose “enabling a user to lay out one or more views for a user interface including allowing the user to select one or more user interface elements from a set of user interface elements for each of the one or more views,” but in fact, *Inanoria* also teaches away by explicitly enumerating the disadvantages of the non-declarative approach in laying out GUI components. *Id.* at ¶ [0008]. For example, *Inanoria* specifically notes that “GUI data is normally bound or coupled with the GUI logic which normally makes the reuse of these GUI objects very difficult especially when working with multibehavioral or multi-modal pages.” *Id.*

Accordingly, neither *Inanoria*, nor any obvious variant thereof, teaches or suggests at least the above-noted elements of amended independent claim 1. For at least this reason, the Examiner has not established a *prima facie* case of obviousness regarding amended independent claim 1. Accordingly, the rejection of amended independent claim 1 under 35 U.S.C. § 103(a) is improper, should be withdrawn, and the claim allowed. Claims 2, 3, and 5-15 should be allowed at least because of their dependence from allowable independent claim 1.

Amended independent claims 16 and 28-31, although of different scope, recite subject matter similar to that of amended independent claim 1. For at least the same reason as set forth above in connection with amended independent claim 1, the cited reference cannot support a rejection of claims 16 and 28-31 under 35 U.S.C. § 103(a), and claims 16 and 28-31 should be allowable over *Inanoria*. Claims 17-24 should be allowed at least because of their dependence from allowable independent claim 16.

**B. *Pena***

*Pena* fails to overcome the deficiencies of *Inanoria* set forth above including the failure of *Inanoria* to teach or suggest, *inter alia*, “enabling a user to lay out one or more views for a user interface including allowing the user to select one or more user interface elements from a set of user interface elements for each of the one or more views,” as recited in amended independent claim 1.

Instead, *Pena* is directed to a system and method for platform and language-independent delivery of page-based content. *Pena*, Abstract. According to the Examiner, *Pena* allegedly discloses “the use of a link for action transitions among page views.” Office Action, p. 4. Thus, at most, *Pena* teaches navigation links and even if

the Examiner's allegations were true, *Pena* fails to teach or suggest "enabling a user to lay out one or more views for a user interface including allowing the user to select one or more user interface elements from a set of user interface elements for each of the one or more views," as recited in amended independent claim 1.

Accordingly, neither *Inanoria*, nor *Pena*, taken alone or in any reasonable combination, teach or suggest at least the above-noted elements of amended independent claim 1. For at least this reason, the Examiner has not established a *prima facie* case of obviousness regarding amended independent claim 1. Accordingly, the rejection of amended independent claim 1 under 35 U.S.C. § 103(a) is improper, should be withdrawn, and the claim allowed. Claims 2, 3, and 5-15 should be allowed at least because of their dependence from allowable independent claim 1.

Amended independent claims 16 and 28-31, although of different scope, recite subject matter similar to that of amended independent claim 1. For at least the same reason as set forth above in connection with amended independent claim 1, the cited references cannot support a rejection of claims 16 and 28-31 under 35 U.S.C. § 103(a), and claims 16 and 28-31 should be allowable over *Inanoria* and *Pena*. Claims 17-24 should be allowed at least because of their dependence from allowable independent claim 16.

**C. *Pattison***

*Pattison* fails to overcome the deficiencies of *Inanoria* and *Pena* set forth above including the failure of *Inanoria* and *Pena* to teach or suggest, *inter alia*, "enabling a user to lay out one or more views for a user interface including allowing the user to

select one or more user interface elements from a set of user interface elements for each of the one or more views,” as recited in amended independent claim 1.

Instead, *Pattison* discloses “the application of graph drawing and information visualisation techniques to the visualisation of information which can be modelled as an attributed graph.” *Pattison*, Abstract. According to *Pattison*, “[t]he heirarchy of containers can be modelled as a *layout composition tree* . . . .” *Id.* at Section 3.2.1. “Each node of the tree specifies a *layout rule*, which dictates the appearance of the corresponding container and the layout of its contents.” *Id.*

In *Pattison*, “[t]he layout composition specification editor shown in Figure 2 consists of the layout composition tree (left) and the *layout rule customiser* (right). Each node in the tree contains a layout rule for the corresponding container, the details of which are specified in the right-hand panel of Figure 2.” *Id.* “The layout of the contents of a container is determined by a *layout strategy*, which is selected by choosing a tab in the layout rule customiser shown at right in Figure 2.” *Id.* at Section 3.2.2.

Thus, *Pattison* does not teach or suggest “enabling a user to lay out one or more views for a user interface including allowing the user to select one or more user interface elements from a set of user interface elements for each of the one or more views,” as recited in amended independent claim 1. Instead, *Pattison* allows a user to select a layout for the visualization of data (e.g., graph, attribute, or blind).

Moreover, *Pattison* teaches visualization techniques, and the disclosed embodiments demonstrate the various techniques and layouts for the visualization of data. Thus, Figure 2 of *Pattison* does not teach or suggest “enabling a user to lay out one or more views for a user interface including allowing the user to select one or more

user interface elements from a set of user interface elements for each of the one or more views," as recited in amended independent claim 1. Instead, Figure 2 of *Pattison* is the user interface for the presentation of data to a user via one of the selected layouts.

Accordingly, neither *Inanoria*, nor *Pena*, nor *Pattison* taken alone or in any reasonable combination, disclose or suggest at least the above-noted elements of amended independent claim 1. For at least this reason, the Examiner has not established a *prima facie* case of obviousness regarding amended independent claim 1. Accordingly, the rejection of amended independent claim 1 under 35 U.S.C. § 103(a) is improper, should be withdrawn, and the claim allowed. Claims 2, 3 and 5-15 should be allowed at least because of their dependence from allowable independent claim 1.

Amended independent claims 16 and 28-31, although of different scope, recite subject matter similar to that of amended independent claim 1. For at least the same reason as set forth above in connection with amended independent claim 1, the cited references cannot support a rejection of claims 16 and 28-31 under 35 U.S.C. § 103(a), and claims 16 and 28-31 should be allowable over *Inanoria*, *Pena*, and *Pattison*. Claims 17-24 should be allowed at least because of their dependence from allowable independent claim 16.

## **II. Conclusion**

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

In addition, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statements are identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

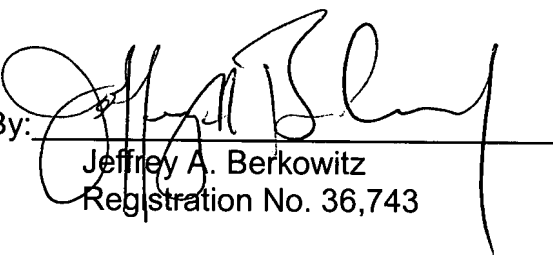
Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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